Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**National Oilwell Varco, L.P. – Harvey Coating Facility**	**AI #:**	**16865**	**TEMPO Activity No:**	**PER20070001**
Facility Name:	**Harvey Coating Plant**	**Remarks Submitted by:**		**Chris L. Bauer, P.E.**	
Permit Writer:	**Hassan Ghosn**	**Permit Writer Email address:**		**Hassan.Ghosn@la.gov**	

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet; I. Background	The first sentence states that the facility is in Assumption Parish. The facility is actually in Jefferson Parish.	Changed as requested.
Air Permit Briefing Sheet; I. Background	Page 1, paragraph 6 should reference only external coatings, not all coatings.	Changed as requested.
Air Permit Briefing Sheet; III. Description	The table of Chapter 51 typical TAPs indicates that the toluene emission rate before this modification was 1.501; however, the August 19, 2002 Part 70 Permit approved toluene emissions of 7.84 tons/yr.	The lower toluene emission rate (1.501 tons/yr) incorporates the reduction in toluene emissions that resulted from replacing the final bake oven and the use of water-based solvent with the external coating activities.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet; III. Description	The table of non-VOC Chapter 51 TAPs indicates that the change in ammonia emissions is +0.050; however, the ammonia emission rate is being reduced from 0.300 to 0.250 tons/yr.	Based on the revised submittal dated September 16, 2009, the ammonia total emission is 0.210 tons/yr and consequently, the change is + 0.090 tons
Air Permit Briefing Sheet; III. Description	"Other VOC (TPY):" is indicated as being 44.11. This emission rate should be 87.02 TPY, the maximum emission rate of other VOC if the TAPs emission rate was zero. The other VOC emission rate would need to be more than 76.041 TPY since the permit application represented a maximum mineral spirits emission rate of 76.041 TPY.	Reference to Other VOC is removed to avoid confusion due to the presence of Caps.
Air Permit Briefing Sheet; V. Public Notice	The public notice section indicates that notice was published in *The Daily Review, Morgan City*. Instead of publishing notice in Morgan City, should notice be published in a city that is closer to Harvey, such as New Orleans.	The information in the Public Notice section is not final and will be properly updated after the comment period ends.
Air Permit Briefing Sheet; V. Public Notice	Notice was previously published in 2007 in the New Orleans Times-Picayune.	The newspaper in which the public notice will be published will be reported in this section.
Specific Requirements (document TPOR0147 . . .)	For CRG 0001, can the use of aluminum oxide be exempted from the requirements listed in LAC 33:III.1327.B under LAC 33:III.1327.B.5?	Aluminum oxide is not specifically listed and exemption is not granted at this time.
Specific Requirements (document TPOR0147 . . .)	Regarding Special Requirement 54 for GRP 0003: NOV requests that this permit requirement be revised to require monitoring usage of paint, non-organic, and organic solvent "daily" rather than "continuously" due to the nature of these operations.	Request granted.
Specific Requirements (document TPOR0147 . . .)	For ARE 0007, ARE 0010, CRG 0002, CRG 0004 and UNF 0001, the specific requirements include keeping records of the information in LAC 33:III.2123.F.1 through F.4. However, F.2 does not apply because the site does not have any VOC control devices. Also, F.4 does not apply because the site does not have any automobile and light-duty truck topcoat operations.	Request will not be granted. The requirement reflects the text of the regulation. The permittee shall maintain the appropriate records for the operations on site. For this facility, the solvent's MSDS sheet is an appropriate record which is F3.
Specific Requirements (document TPOR0147 . . .)	For CRG 0003 the specific requirements include keeping records of the information in LAC 33:III.2123.F.1 through F.4. However, 2123.F does not apply to the powder coating stations that comprise CRG 0003 because these powder coating stations do not utilize any VOCs.	Requirement deleted.

LDEQ-EDMS Document 43691901, Page 38 of 168

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements (document TPOR0147 . . .)	For CRG 0004, change special requirements 39 and 40 to LAC 33:III.2123.A.	Based on the additional information submitted by the facility on June 18, 2009, the facility is exempt, under LAC 33:III.2123.B, from the requirements of LAC 33:III. 2123.A. And the change will be made accordingly.
Specific Requirements (document TPOR0147 . . .)	For clarity, could the references to P-12, S-12, and INSPECT15 be changed to P-1-2, S-1-2 and INSPECT1-5, respectively? (This change would make these references similar to the reference for CRG 0001 B-1-5.)	Changed as requested.
Specific Requirements (document TPOR0147 . . .)	For GRP 0003, specific requirement 54 indicates that the total emissions of volatile organic compounds (VOCs) from the entire facility (Harvey Coating Facility) shall not exceed 64.56 tons during any twelve consecutive month period. This limit of 64.56 tons/12-month period should apply only to the Oven-Coating Emission cap not the entire facility. The VOC limit for the entire facility should be 87.02 tons/12-month period.	The language has been changed to reference only the members of the OVEN-COAT CAP.
Specific Requirements (document TPOR0147 . . .)	For all Subpart HHHHHH specific requirements, add a statement that these requirements are applicable only when using coatings which have concentrations above the thresholds in Subpart HHHHHH, and apply only to those sources in which such coatings are used.	Subpart HHHHHH requirements will be listed and assigned consistent with the revised submittal dated September 16, 2009.
Specific Requirements (document TPOR0147 . . .)	For Specific Requirement 68, in the second sentence should the date of January 10, 2009 be changed to January 10, 2011?	The language of the first paragraph of the subject Specific Requirement (SR No. 68) will read as follows: "Affected existing sources must submit an initial notification to LDEQ with a copy sent to EPA no later than one year before the compliance effective date of January 10, 2011. The initial notification (by January 10, 2010) will also serve as a notification on whether the source is already in compliance or that it will be brought into compliance by January 10, 2011."
Inventories (document TPOR0149 . . . ; Subject Item Inventory Section)	The operating time for all of the units that are currently shown as 2920 hr/yr needs to be revised to 8760 hr/yr to be consistent with the entries on the EIQ forms (i.e., the entries that state "max. operating time of facility is 8760 hrs/yr"). The lower operating time values were used to calculate average emissions to ensure they would not be incidentally exceeded if operating hours were less than 8760 hr/yr. However, the maximum potential operating hours per year should be listed as 8760.	Change is made based on the updated information submitted September 22 , 2009.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Inventories (document TPOR0149 . . . ; Stack Information Section)	The velocity from EQT 0009 should be changed from 2000 to 46 and the velocity from EQT 0011 should be changed from 500 to 1, based on the EIQ.	Updated as requested.
Inventories (document TPOR0149 . . . ; Stack Information Section)	The following Flow Rates should be changed to be consistent with the EIQ: 1) EQT 0013--change 3500 to 2700; 2) EQT 0014—change 3500 to 2700; 3) EQT 0015—change 3500 to 1300; 4) EQT 0016—change 3500 to 1300; 5) EQT 0017—change 2500 to 960; 6) EQT 0018—change 3500 to 960; 7) EQT 0019—change 2500 to 490; 8) EQT 0021—change 2500 to 1500.	Updated as requested.
Inventories (document TPOR0149 . . . ; Stack Information Section)	For EQT 0017, change the temperature from 300 to 600°F, and for EQT 0021, change the diameter to 0.7 and change the temperature from 400 to 300°F.	Updated as requested.
Inventories (document TPOR0149 . . . ; Group Membership Section)	For EQT 0006 (T2 – TK Wash Tank) and EQT 0020 (C3 Paint Booth #1), include GRP0000000003 since these units are in the OVEN-COATCAP.	Updated as requested.